U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION I

SEMS DocID 630136

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

DATA INPUT FORMS FOR SUMMARY MODEL

Facility Name: Tri-Star Sports, Inc.

EPA ID#: CTD052544376

Address: 475 Smith Street

Middletown, Connecticut

Facility Contact: Paul Snoke Title: Environmental Engineer

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Organization: Region I/ARCS

Phone: 203-257-3320 Date: March 18, 1992

INSTRUCTIONS

The Data Input Forms for the Summary Model have been developed to aid in the collection of specific data during assessment of RCRA regulated facilities. The data will be used to better meet national RCRA program reporting needs developed for treatment and storage facilities but may also be applied to disposal facilities.

The following pages are organized into four migration pathways, including Groundwater, Surface Water, Air, and On-Site. Each pathway has instructions on the left-hand side, and data sheets on the right. In addition to filling in the appropriate blanks and/or checking the appropriate boxes on the data sheets, please provide an indication of your confidence in those data by checking the appropriate box in the right margin, based on the following scale:

Estimated	The information known about the facility only allows an estimated answer (please comment to indicate source and rationale for estimate).
Confirmed	Information was found in the referenced document to support the answer, or a site visit confirmed the information.

Check the appropriate box as best as you can. This will provide a future analyst an indication of the data quality in order to determine if additional study is required. However, these data are being used to derive numerical scores, so be as precise as possible, and make use of the spaces provided for any comments.

Comments to support data are needed and should be added on the data and comment sheets. On the instruction sheets, for example where potential "sources" are indicated, simply circle the source(s) that provided the information (see Appendix C for a description of suggested sources). *In all cases,* please provide the name and date of the document or the number of the reference on the comment line provided so that the source can be located in the future, if necessary. A blank has been provided to list actual references reviewed. Refer to Appendix A for waste characteristic information for specific chemicals, Appendix B for net precipitation, and Appendix D for 1-year 24-hour rainfall data for New England States.

In many cases, the data requested are the same or similar to the data used in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Preliminary Assessment Method scoresheets. In these cases, an asterisk (*) has been placed in the instructions with the item number to assist the analyst in the event both sets of forms are being completed at the same time.

Worksheets numbered 1 - 5 have been provided to aid the analyst in reviewing and evaluating the site (see forms and Appendix E). Use Worksheets numbered 1 and 2 to identify each hazardous waste management unit, its condition of containment, and its associated chemicals of concern. Use Worksheets numbered 3, 4, and 5 to determine the site's most toxic and persistent chemical for each route.

REFERENCES

Please provide the name and date (and pages, if appropriate) of each document used to complete this booklet.

No.	Reference
1	Insall, J. (Region I/ARCS). On site reconnaissance (OSR), January 20, 19
2	CT DEP. RCRA Inspection Checklist at Tri-Star, March 18, 1991.
3	USGS. 7.5' series Topographic Map of the Middletown Quadrangle, 1984.
4	CT DEP, Community Water Supply Systems Atlas, June, 1984.
5	U.S. EPA. Integrated Environmental Management Database. March 199
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WORKSHEET #1
Facility Unit Identification

List each specific unit at the site, its size, and condition of containment. Use this worksheet to identify the site's specific units and to select the worst containment level for each unit and for each pathway. Within the selected condition of containment, assign GW for the groundwater route, SW for the surface water route, AR for the air route, and OS for the on-site route. The worst conditions will be entered on the data sheets for each route.

Area or Unit #	Area or Unit Name & Description	Size	Condition of Containment				Ref #
			Very Good	Good	Fair	Poor	
1	Hazardous Waste Storage	90 drums	OS				1
2	Non-Hazardous Waste Storage	1500 sq. ft.			SW		1,
3	Spill Collection Vault	5000 gal.				GW	2
4	Trenches and Sump	240 feet 200 gal			GW		1
5	1000 gal Used Oil Storage Tank	1000 gal			SW		1,2
6	Three Air Scrubbers	Unknown		AR			1
7							
8							
9							
10							
11							
12							
13							
14							
15							

☐ check here if additional sheets are attached

WORKSHEET #2
Unit Contents

Use this worksheet to check off the specific chemicals found at each unit. Refer to areas or units by number based on Worksheet #1. If specific chemicals have not been identified, use chemical groups.

Chemical Name or Waste Type	Area or Unit #														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1,1,1 Trichloroethane, F001	X				X										
Waste Paint, D001	X														
Waste lab packs D005-D006	X		X												
D007, D008, D010, D002,															
F002, F003, U226															
Weed Killers, D001	X														
Grinding Sludge, CR02		X		X											
Grinding Dust, CR02						X									
Sludge															
Oily Waste															
Solvents															
Pesticides															
Other Organic Chemicals															
Inorganic Chemicals															
Acids															
Bases															
Heavy Metals															

 ☐ check here if additional sheets are attached

GROUNDWATER ROUTE
Instructions & Sources
First Page

A. Observed Release

***1. Is There an Observed Release?**

Yes, if there is documented groundwater contamination above background levels or above the drinking water maximum contaminant level (MCL); or No, if there is no documentation or indication of a release; Possible, if groundwater quality data or the site visit lead you to believe a release to the groundwater may have taken place (e.g., unlined lagoon, spill residue on ground, underground storage tank with no groundwater monitoring system, or subsurface/surface soil contamination). Documentation may include analytical evidence, or a report by a regulatory agency or by a facility employee stating that a release has occurred.

Sources (circle): Monitoring Reports; Site Visit; 3007 Response; Water Compliance Monitoring Files; Site Inspections; Spill Reports
Comment and other source (date): _____

B. Route Characteristics

***1. Depth to Aquifer**

Enter the depth from ground surface to the aquifer beneath the site (in feet).

Sources (circle): Monitoring Reports; Inspection Reports; Part B.
Comment and other source (date): USGS

2. Net Precipitation

Subtract mean annual lake evaporation from the normal annual total precipitation in order to obtain the average net precipitation for the area.

Sources (circle): See Appendix B.
Comment and other source (date): _____

3. Physical State

Evaluate the physical state of the waste most likely to impact the groundwater in the event of a release. Consider the volume, condition and content and select the least stable physical state of the wastes on site:

stable solid
unstable solid
powder, ash
liquid, gas, sludge

Sources (circle): Site Visit; Inspection Reports; Part A.
Comment and other source (date): _____

GROUNDWATER ROUTE
Data & Comments
First Page

A. Observed Releases

1. Is there an observed release? (circle one):

   Yes (No) Possible

Comments: NO documented or observed releases to the groundwater pathway exist at Tri-Star Sports.

B. Route Characteristics

1. Depth to Aquifer (feet): 10
2. Net Precipitation (inches): 16
3. Physical State (check one):

   - ☐ Stable Solid (most stable)
   - ☐ Unstable Solid
   - ☐ Powder, Ash
   - ■ Liquid, Gas, Sludge (least stable)

Comments: Tri-Star produced grinding sludge in grinding operations.

C. Containment

*1. Containment is a measure of the physical barriers in place to inhibit a waste from entering the groundwater pathway either now or in the past. Do not consider natural barriers (e.g., an underlying clay layer) when evaluating containment criteria. If there are multiple SWMUs, select the SWMU with the worst containment level. Interpret the descriptions in site reports or similar documents, using the following criteria as guidelines:

Unit	Migration/Potential	Score
Sealed Container/Tank	Sound Secondary Containment	Very Good
Sealed Container/Tank	Unsound Secondary Containment	Good
Leaky Container/Tank	Sound Secondary Containment	Good
Underground Storage Tank	Tank Integrity Unknown	Good
Sealed Container/Tank	No Secondary Containment	Fair
Leaky Container/Tank	Unsound Secondary Containment	Fair
Leaky Container/Tank	No Secondary Containment	Poor
Land-based Unit		Poor

Unit scored (include description and dates in use); use *Worksheet #1*:
Underground Spill Collection Vault - 1969-1989

Sources (circle): Inspection Reports; Water Compliance Reports; Site Visit; 3007 Response.
Comment and other source (date): -

GROUNDWATER ROUTE
Data & Comments
Second Page

C. Containment (check one):

- ☐ Very Good
- ☐ Good
- ☒ Fair
- ■ Poor

Comments: Underground vault used for spill collection from the hazardous waste storage area was unit scored. This tank was found filled with groundwater during a 1989 RCRA inspection on the property. The tank was removed in 1990.

GROUNDWATER ROUTE
Instructions & Sources
Third Page

D. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number

Enter the one chemical or waste code of most concern (for the groundwater route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #3* to determine toxicity/persistence for each chemical of concern for the groundwater route (included in Worksheet #2). Do not consider concentrations of contaminants.

Sources (circle): For determining contaminants of concern: Site Visit, Groundwater Analytical Data. For determining most toxic compound: (See Appendix A.)
Comment and other source (date): RCRA Inspection 1991

2. Toxicity/Persistence

Value for the chemical or waste of concern. This contaminant should be at a SWMU that has a containment score less than "VERY GOOD". Refer to *Worksheet #3.*

Sources (circle): (See Appendix A.)
Comment and other source (date): _____

WORKSHEET #3
Chemical Toxicity/Persistence Values for Groundwater and Surface Water Routes

Identify and list each chemical at the site which has the potential to migrate to the groundwater or surface water routes. List the RCRA waste code and CAS number, if known. Obtain toxicity/persistence values from Appendix A for each chemical. Use the worksheet to select the chemical with the highest toxicity/persistence value (0-18) and enter its name and value in the Waste Characteristics section for the groundwater and surface water routes. Note in comments if toxicity/persistence information was not available.

CAS #	Chemical Name and/or Waste Code	toxicity/persistence 0-18	GW or SW
N/A	Lead, D008	18	GW
108907	1,1,1 Trichloroethane, F001	12	SW

 ☐ check here if additional sheets are attached

GROUNDWATER ROUTE
Data & Comments
Third Page

D. Waste Characteristics

1. **Chemical Name and/or RCRA Waste Code Number:**

   Lead, D008

2. **Toxicity/Persistence Value (circle one):**

   0 3 6 9 12 15 (18)

Comments: Lead containing wastes were removed from the hazardous waste storage area during the plant closure in 1990. According to historical facility annual reports on file at CT DEP, Lead (D008) was not a waste stream generated at the plant. Olin, the parent company, was unaware of this waste stream generated at Tri-Star Sports.

***3. Waste Quantity**

Report wastes for units only if containment is other than "VERY GOOD." If Containment is "VERY GOOD" for all units, waste quantity equals zero.

If quantity is known, convert data to a common unit: assume 1 ton = 1 cubic yard = 4 drums. For the purpose of converting bulk storage, assume 1 drum = 50 gallons. Enter waste quantity in cubic yards, tons or drums.

If quantity is unknown, estimate waste quantity using the following criteria:

< 10 yd^3 (or < 40 drums)	small
100 - 1,000 yd^3 (or 400 - 4,000 drums)	large
> 1,000 yd^3 (or > 4,000 drums)	large storage or disposal areas

If the site has multiple SWMUs, combine all waste quantities for SWMUs capable of migrating to groundwater (containment scores less than "VERY GOOD"). Use *Worksheet #1* to assist in combining waste quantities.

Sources (circle): Part A; Tank Capacities; Permitted Drum Storage Capacity; Inspection Reports; 3007 Response; Annual Reports; Part B.
Comment and other source (date): _____

GROUNDWATER ROUTE
Data & Comments
Fourth Page

3. Quantity Known (circle one)?

Yes (No)

If Yes, enter actual amount:

_____ cubic yards or tons
_____ drums

If No, check one:

- ■ Is amount likely to be small?
- □ Is amount likely to be large?
- □ Are large storage or disposal areas present?

Comments: Waste quantities stored in the non-hazardous waste storage area are unknown. Amounts of sludge generated in grinding operations are unknown. In general, Tri-Star disposed of small quantities of waste while they were in operation.

E. Targets

*1. Groundwater Use

Options are given in order from the most critical (Drinking Water) to the least critical (Not Impacted). Check the most critical groundwater use that occurs within 3 miles of the site. "Drinking Water" indicates that the groundwater was previously used, is presently used, or is likely to be used in the future for drinking water. If drinking water use is not documented, check Possible Drinking Water, unless specific information refutes this possibility (for example, industrial use of unusable aquifer due to low yield).

If you can verify that none of these uses apply, then check:

Quality Impacted, if there is an observed release.
Quality Not Impacted, if there is no observed release.

Source (circle): Monitoring Report, GIS, Local Water Department.
Comment and other source (date): _____

*2. Distance to Intake

Distance (in miles) to the nearest drinking water well within 3 miles of the facility. If unknown, use distance between hazardous substance and nearest residence where groundwater may be used for drinking water. If the use of the groundwater is unknown ("Possible Drinking Water"), "Quality Impacted," or "Quality Not Impacted," assign "2 to 3 miles" for the distance. If the groundwater flow direction is known, do not consider upgradient wells as receptors.

Source (circle): GIS; USGS Topographic Map or Site Map; Site Visit; Part A; State Atlas.
Comment and other source (date): _____

GROUNDWATER ROUTE
Data & Comments
Fifth Page

E. Targets

1. Groundwater Use (check only *one*):

- ■ Drinking Water
- □ Possible Drinking Water
- □ Agriculture or Industrial

- □ Quality Impacted
- ■ Quality Not Impacted

2. Distance to intake (to the nearest ½ mile): 1/2 mile

Comments: The closest resident not served by public water supplies is approximately 1/2 mile southeast of the property.

SURFACE WATER ROUTE
Instructions & Sources
First Page

The surface water pathway is assessed to determine whether contaminated runoff has reached surface water or if site characteristics make a release to surface water likely.

A. Observed Release

*1. Yes, if there is a evidence of a direct discharge of contaminants to surface water; No, otherwise. A direct discharge can include such events as spills, runoff from contaminated soils, or discharge of contaminated groundwater. Documentation may include analytical evidence, a report by a regulatory agency or by a facility employee stating that a release has occurred.

Sources (circle): Site Visit; Monitoring Reports; 3007 Response.
Comment and other source (date): _____

B. Likelihood of Release

1a. Permitted Outfall

Yes, if there is a permitted outfall; No, if there is not.

Sources (circle): Department of Environmental Protection; EPA Files
Comment and other source (date): _____

1b. Violations

Yes, if there have been permit violations; No, if there have not.

Sources (circle): Department of Environmental Protection; EPA Files
Comment and other source (date): _____

*2. Facility Location

Select flood prone area, 100-year floodplain, or other. If floodplain information is unavailable, check "Other."

Sources (circle): Flood Insurance Study Maps.
Comment and other source (date): _____

SURFACE WATER ROUTE
Data & Comments
First Page

C ■ E ■

A. Is there an observed release? (circle one)

Yes (No)

Comments: No documented or observed releases exist for the surface water pathway

B. Likelihood of Release

1a. Is there a permitted outfall? (circle one) ■ □

(Yes) No

1b. If so, have there been permit violations? (circle one) ■ □

Yes (No)

2. Facility Location (check one): ■ □

- □ Flood prone area
- □ 100 year flood plain
- ■ Other

Comments:

C. Route Characteristics

1. 24-hour Rainfall

Enter the 1-year, 24-hour rainfall. Refer to contour maps in Appendix D.

Sources (circle): (See Appendix B.)
Comment and other source (date): _____

*2. Distance to Surface Water

Enter distance in miles. If surface water is discharged to a stream or river through a ditch, then, if the ditch always has water in it, use the distance to the ditch; if water in the ditch is intermittent, use the distance to the stream or river.

Sources (circle): (USGS; Site Visit) GIS.
Comment and other source (date): _____

3. Physical State

Evaluate the physical state of the waste most likely to impact surface water in the event of a release. If there are multiple SWMUs, select the least stable physical state of the wastes on site:

stable solid
unstable solid
powder ash
liquid, gas, sludge

Sources (circle): 3007 Response; (Site Visit)
Comment and other source (date): _____

SURFACE WATER ROUTE
Data & Comments
Second Page

C. Route Characteristics

1. **24-hour Rainfall (inches):** 2.5

2. **Distance to Surface Water (miles):** ≤0.1

3. **Physical State (check one):**

- ☐ Stable Solid (most stable)
- ☐ Unstable Solid
- ☐ Powder, Ash
- ■ Liquid, Gas, Sludge (least stable)

Comments: Sawmill Brook is located along the eastern border of the property. Virgin 1,1,1 trichloroethane is the substance most likely to enter the surface water pathway on the property.

*4. **Containment**

Containment is a measure of the physical barriers in place to inhibit a waste from entering the surface water pathway. If there are multiple SWMUs, select the SWMU with the worst containment level.

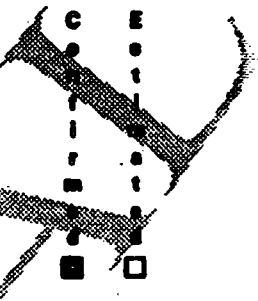
Use the following criteria as guidelines (e.g., consider a lined lagoon with unbreached berms as a "sealed container"):

Unit	Containment/Migration Potential	Score
Sealed Container/Tank	Sound Secondary Containment	Very Good
Sealed Container/Tank	Unsound Secondary Containment	Good
Leaky Container/Tank	Sound Secondary Containment	Good
Underground Storage Tank	Tank Integrity Unknown	Good
Sealed Container/Tank	No Secondary Containment	Fair
Leaky Container/Tank	Unsound Secondary Containment	Fair
Leaky Container/Tank	No Secondary Containment	Poor
Land-based Unit		Poor
Contaminated Groundwater	Discharge to Surface Water	Poor
Contaminated Surface Soil	Runoff to Surface Water Likely	Poor

Unit scored (include description and dates in use); use *Worksheet #1*:
Virgin 1,1,1 trichloroethane tank 1969-1989 est.

Sources (circle): Inspection Reports; 3007 Response; Site Visit.
Comment and other source (date): _____

SURFACE WATER ROUTE
Data & Comments
Third Page



4. **Containment (check one):**

- ☐ Very Good
- ■ Good
- ☐ Fair
- ☐ Poor

Comments: The virgin 1,1,1 trichloroethane tank located in the virgin material storage area is the unit most likely to contribute to the surface water pathway. This unit is being considered waste because it's contents were removed of as waste in the closure.

D. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number

Enter the one chemical or waste code of most concern (for the surface water route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #3* (on page 10 in groundwater section) to determine toxicity/ persistence for each chemical of concern for the surface water route (included in *Worksheet #2*).

Sources (circle): For determining contaminants of concern: (Site Visit), Surface Water/ Sediment Analytical Data. For determining most toxic compound: (See Appendix A.)
Comment and other source (date): _____

2. Toxicity/Persistence

Value for the chemical or waste of concern. Refer to *Worksheet #3.*

Sources (circle): (See Appendix A.)
Comment and other source (date): _____

SURFACE WATER ROUTE
Data & Comments
Fourth Page

D. Waste Characteristics

1. **Chemical Name and/or RCRA Waste Code Number:** 1,1,1 Trichloroethane / F001

2. **Toxicity/Persistence Value (circle one):**

0 3 6 9 (12) 15 18

Comments:

***3. Waste Quantity**

Report units only if containment is other than "Very Good." If Containment is "VERY GOOD" for all units, waste quantity equals zero.

If quantity is known, convert data to a common unit, assume 1 ton = 1 cubic yard = 4 drums. For the purpose of converting bulk storage, assume 1 drum = 50 gallons. Enter waste quantity in cubic yards, tons or drums.

If quantity is unknown, estimate waste quantity using the following criteria:

< 10 yd^3 (or < 40 drums)	small
100 - 1,000 yd^3 (or 400 - 4,000 drums)	large
100 - 1,000 yd^3 (or > 4,000 drums)	large storage or disposal areas

If the site has multiple SWMUs, use combined waste quantities. Use *Worksheet #1* to assist in combining waste quantities. Generally, amount would be small for only contaminated groundwater discharging to surface water or if there is just a likelihood that contaminated soil is likely to reach surface water through surface runoff.

Sources (circle): Part A; Inspection Reports; 3007 Response; Annual Reports; Part B.
Comment and other source (date): _____

SURFACE WATER ROUTE
Data & Comments
Fifth Page

3. Waste Quantity Known? (circle one)

Yes (No)

If Yes, enter amount:

_____ cubic yards or tons
_____ drums

If No, check one:

- ■ Is amount likely to be small?
- □ Is amount likely to be large?
- □ Are large storage or disposal areas present?

Comments: Waste quantity of wastes stored in all areas other than the hazardous waste storage area is unknown but assumed to be small

E. Targets

*1. Type of Surface Water Use

Options are given in order from most critical (Drinking Water) to least critical. Check the most critical that applies. Check "Drinking Water" if surface water was previously used, is presently used, or is likely to be used in the future as drinking water. If drinking water use is not documented, check "Possible Drinking Water", unless specific information refutes this possibility.

If there is no information regarding the use of a river or stream, assume recreational use. Often, close recreational use is more likely to have an impact than a drinking water intake. If you can verify that none of the uses apply, then check:

Quality Impacted, if there is an observed release.
Quality Not Impacted, if there is no observed release.

Further distinguish depending on whether the distance to surface water is < 3 miles.

Sources (circle): GIS; Site Visit; Local Water Department.
Comment and other source (date): EPA, 1992

*2. Distance to Intake or Contact Point

Distance from site to the point of surface water use (drinking water intake, recreation area, etc.). If there is no information on the use of a surface water body receiving a discharge from the facility, the distance to the contact point should be the distance from the facility to the nearest point of the surface water body. If discharge is through a ditch, use the distance to the stream, river, or water body, not the distance to the ditch.

Sources (circle): Hydrographic Atlas; GIS; Site Visit; Town Records.
Comment and other source (date): _____

*3. Distance to Sensitive Environment

Enter the distance from the site to a sensitive environment along the surface water route. Sensitive environments include freshwater wetlands (greater than 2 acres), marshes, swamps, parks (national or state), and critical habitats of state and federal proposed and listed endangered species.

Sources (circle): GIS; State Department of Fisheries & Wildlife; USGS.
Comment and other source (date): Site Visit

SURFACE WATER ROUTE
Data & Comments
Sixth Page

	Confirmed	Estimated
	■	□

E. Targets

1. Type of Surface Water Use (check one):

- □ Drinking Water
- ■ Possible Drinking Water
- □ Recreation
- □ Agricultural or Industrial
- □ Quality Impacted
- □ Quality not Impacted (but within 3 miles)
- □ No Surface Water Bodies (within 3 miles)

2. Distance to the Intake or Contact Point (miles): .1 — ■ □

3. Distance to Sensitive Environment (miles): .1 — ■ □

Comments: Sawmill Brook is listed in the EPA IEM Database as a potential drinking water supply source. Wetlands are located at the eastern side of the property.

For the air pathway, site charateristics are considered to address the potential for release even if no release has been documented. But the air pathway differs somewhat from the groundwater and surface water routes in assessing containment. In the case of air releases, *current* conditions must be used in completing these forms to assess the likelihood of releases.

A. Observed Release

*1. Is there an observed, unpermitted, ongoing release?

Yes, if there is a documented, unpermitted, ongoing release to the air route from a SWMU; or No, if there is not a documented release. Documentation may include analytical evidence, a report by a regulatory agency or by a facility employee stating that a release has occurred, or by indirect evidence. Do not score an observed release based on an isolated explosion or fire, but event should be noted in comments.

Sources (circle): Monitoring Reports; Inspection Reports; Site Visit; 3007 Response; TRI; Department of Environmental Protection.
Comment and other source (date): _____

AIR ROUTE
Data & Comments
First Page

A. Observed Release

1. Is there an observed, unpermitted, ongoing release? (circle one)

   Yes (No)

Comments: No documented or observed releases exist

AIR ROUTE
Instructions & Sources
Second Page

B. Likelihood of Release

***1. Does the facility have an operating air permit?**

Yes, if the facility has an operating permit; or No, if it does not.

Sources (circle): EPA; Department of Environmental Protection.
Comment and other source (date): _____

***2. Have there been any permit violations or odor complaints by residents?**

Yes, if there have been permit violations or odor complaints; or No, if there have not.

Sources (circle): Department of Air Quality Control; EPA.
Comment and other source (date): _____

3. Can contaminants migrate into air?

Yes, if contaminant migration to air is possible; or No, if contaminant migration to air is not possible. See *Worksheet #4* for determining contaminants of concern for the air pathway.

Sources (circle): EPA; Versar document.
Comment and other source (date): _____

***4. Containment (circle one):**

Containment is a measure of the physical barriers in place to inhibit a waste from entering the air pathway. Interpret the descriptions in site reports or similar documents, using the following criteria as guidelines (for CURRENT conditions):

Unit	Containment/Migration Potential	Score
Closed Container/Tank	Inside Building	Very Good
Land-based Unit	Covered	Very Good
Storage Tank	Underground	Very Good
Closed Container/Tank	Open Area	Good
Open Container/Tank	Inside Building	Fair
Open Storage Tank	Underground	Fair
Open Container/Tank	Open Area	Poor
Land-based Unit	Open	Poor
Contaminated *Surface* Soil		Poor

If there are open drums, consider the entire set of drums in the storage area as open when scoring the containment. Outdoor wastewater treatment plant units are considered poor.

Unit scored (include description and dates in use); use *Worksheet #1*: 1,1,1 trichloroethane tank was scored 1969-1989

Sources (circle): Site Visit; 3007 Response; Inspection Reports.
Comment and other source (date): _____

AIR ROUTE
Data & Comments
Second Page

B. Likelihood of Release

1. Does the facility have an operating air permit? (circle one) — ■ □

   Yes (No)

2. Have there been any permit violations or odor complaints by residents? (circle one) — ■ □

   Yes (No)

3. Can contaminants migrate into air? (circle one) — ■ □

   Yes (No)

4. Containment (circle one): — ■ □

   - ■ Very Good
   - □ Good
   - □ Fair
   - □ Poor

Comments: 1,1,1 Trichloroethane tank indoors was scored. Three permitted Air scrubbers operating on property were used for non-hazardous dust collection. Several odor complaints by nearby residents were filed with the CT DEP Air Compliance Unit regarding odors in the vicinity of Tri-Star Sports in 1987 and 1989. The CT DEP found no odors upon inspection of Tri-Star Sports.

AIR ROUTE
Instructions & Sources
Third Page

C. Waste Characteristics

1. **Chemical Name and/or RCA Waste Code Number**

Enter the one chemical or waste code of most concern (for the air route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #4* to determine toxicity for each chemical of concern for the air route (included in *Worksheet #2*).

Sources (circle): For determining contaminants of concern: Site Visit, Soil Analytical Data; Permits. For determining most toxic compound: See Appendix A.
Comment and other source (date): _____

2. **Toxicity**

Value for the chemical or waste of concern. Refer to *Worksheet #4*.

Sources (circle): See Appendix A.
Comment and other source (date): _____

WORKSHEET #4
Chemical Toxicity Values for Air Route

Identify and list each chemical at the site which has the potential to migrate to the air route. List the RCRA waste code and CAS number, if known. Obtain toxicity values from Appendix A for each chemical. Use the worksheet to select the chemical with the highest toxicity value (0-3) and enter its name and value in the Waste Characteristics section for the air route.

CAS #	Chemical Name and/or Waste Code	toxicity 0-3
108907	1,1,1 trichloroethane	2

AIR ROUTE
Data & Comments
Third Page

C. Waste Characteristics

1. Chemical Name and/or RCRA Waste Code Number

   1,1,1 trichloroethane, F001

2. Toxicity Value (circle one)

   0 1 (2) 3

Comments:

*3. Waste Quantity

The air route should be completed using *current* waste quantities and *current* containment conditions.

Report wastes only if Containment is other than "VERY GOOD." If Containment is "VERY GOOD" for all units, waste quantity equals zero.

If quantity is known, convert data to a common unit, assume 1 ton = 1 cubic yard = 4 drums. For the purpose of converting bulk storage, assume 1 drum = 50 gallons. Enter quantity in cubic yards, tons, or drums.

If quantity is unknown, estimate waste quantity using the following criteria:

< 10 yd^3 (or < 40 drums)	small
100 - 1,000 yd^3 (or 400 - 4,000 drums)	large
> 1,000 yd^3 (or > 4,000 drums)	large storage or disposal areas

If the site has multiple solid waste management units (SWMUs), use combined waste quantities. Use the amount of volatiles and particulates with containment values less than "VERY GOOD" to determine waste quantity for the air route. If the facility discharges to air, include the amount of waste released in determining waste quantity.

Sources (circle): Part A; (Inspection Reports; 3007 Response.
Comment and other source (date): _____

AIR ROUTE
Data & Comments
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3. **Waste Quantity Known? (circle one)**

Yes **(No)**

If YES, enter actual amount:

_____ cubic yards or tons
_____ drums

If No, check one:

- ■ Is amount likely to be small?
- □ Is amount likely to be large?
- □ Are large storage or disposal areas present?

Comments: Actual waste quantities of wastes stored in all areas other than hazardous waste storage area are unknown. Tri-Star generated small yearly quantities of wastes.

D. Targets

*1. Population

Determine if residences, industries, and agriculture are located within 4 miles of the site. Residence indicates a single person or more. Check most critical item which applies.

Sources (circle): GIS; Site Visit; Local Planning Department.
Comment and other source (date): _____

*2. Distance to Sensitive Environments?

Enter the nearest distance from the site to a sensitive environment in miles. Sensitive environment includes freshwater wetlands (greater than 2 acres), marshes, swamps, parks (national or state), and critical habitats of state and federal proposed and listed endangered species.

Sources (circle): GIS; State Department of Fisheries & Wildlife; USGS.
Comment and other source (date): site visit

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D. Targets

1. **Population (check one only)**

- ■ Are residences located within 4 miles (most critical)?
- ☐ Are other industries located within 4 miles?
- ☐ Are agricultural lands located within 4 miles (least critical)?
- ☐ Any other situation? Please comment:

The Louis Cucia Park (playground) adjacent

2. **Distance to Sensitive Environments (miles)** .1

Comments: Wetlands are located on the eastern border of the property. The Louis Cucia Park is located on the other side of the brook east of the property. This park is used as a children's playground.

The on-site exposure pathway assesses the potential that people or sensitive environments will have direct physical contact with hazardous constituents or contaminated soil.

A. Access to Site

1. Is the site accessible to nearby residents?

Rate the accessibility as follows:

	Score
A 24-hour surveillance system or a barrier (fence, etc.) is in place with a means to control entry:	Inaccessible
A less than 24-hour ecurity guard but no barrier; OR a barrier but no separate means to control entry; OR a fence that is partially open:	Limited Access
No barrier and no security guard:	Unlimited Access

Sources (circle): (Site Visit) Facility Inquiry.
Comment and other source (date): _____

B. Observed Soil Contamination

*1. Is there observed soil contamination?

Yes, if there is sampling information showing concentrations of contaminants greater than background; or No, if there is not a documented release to soil. If indirect evidence such as stressed vegetation, indicates a release, estimate Yes and comment. Do not score an observed release if contaminated soil is covered by 2 feet or more of clean soil or is covered by concrete or asphalt.

Sources (circle): Monitoring Reports; (Site Visit); 3007 Response.
Comment and other source (date): _____

ON-SITE ROUTE
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First Page

C E
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A. Access to site

1. **Rate the accessibility of the site (check one):** ■ □

- □ Inaccessible
- □ Limited access
- ■ Unlimited access

Comments: No fences restrict access to the plant

B. Observed Soil Contamination

1. **Is there observed soil contamination? (circle one):** ■ □

Yes (No)

Comments: No soil contamination has been documented or was observed on the property.

C. Containment

1. Containment is a measure of the physical barriers in place to inhibit a waste from entering the on-site pathway either now or in the past. Use the same containment factor selected in the Groundwater Route section:

Unit	Containment/Migration Potential	Score
Sealed Container/Tank	Sound Secondary Containment	Very Good
Sealed Container/Tank	Unsound Secondary Containment	Good
Leaky Container/Tank	Sound Secondary Containment	Good
Underground Storage Tank	Tank Integrity Unknown	Good
Sealed Container/Tank	No Secondary Containment	Fair
Leaky Container/Tank	Unsound Secondary Containment	Fair
Leaky Container/Tank	No Secondary Containment	Poor
Land-based Unit		Poor

Unit scored (include description and dates in use); use *Worksheet #1*:
Underground Spill Collection Vault - 1969-1989.

Sources (circle): Investigation Reports; Site Visit; 3007 Response.
Comment and other source (date):

ON-SITE ROUTE
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C. Containment:

1. Containment score (check one):

- ☐ Very Good
- ☐ Good
- ☐ Fair
- ■ Poor

Comments: The underground vault used for spill collection from the hazardous waste storage area was the unit scored. This tank was found filled with ground-water during a 1989 RCRA inspection on the property. The spill collection vault was removed in 1990.

D. Waste Characteristics

1. **Chemical Name and/or Waste Code Number**

Enter the one chemical or waste code of most concern (for the on-site route) as defined by the chemical with the highest Sax toxicity rating, as found in Appendix A. Use *Worksheet #5* to determine toxicity for each chemical for the on-site route (included in *Worksheet #2*).

Sources (circle): For determining contaminants of concern: Part A; (Site Visit) Soil Analytical Data. For determining most toxic compound: See Appendix A.
Comment and other source (date): _____

2. **Toxicity**

Value for the chemical or waste of concern. Refer to *Worksheet #5*.

Sources (circle): (See Appendix A.)
Comment and other source (date): _____

WORKSHEET #5
Chemical Toxicity Value for On-Site Route

Identify and list each chemical at the site which has the potential to migrate to the on-site route. List the RCRA waste code and CAS number, if known. Obtain toxicity values from Appendix A for each chemical. Use the worksheet to select the chemical with the highest toxicity value (0-3) and enter its name and value in the Waste Characteristics section for the on-site route.

CAS #	Chemical Name and/or Waste Code	toxicity 0-3
N/A	Lead, D008	3
108907	1,1,1 Trichloroethane	2
N/A	Waste Paint, D001	—

 ☐ check here if additional sheets are attached

ON-SITE ROUTE
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Third Page

Confirmed ■ Evidence ■

D. Waste Toxicity

1. Chemical Name and/or RCRA Waste Code Number: 1,1,1 trichloroethane, F001 ■ □

2. Toxicity Value (circle one): ■ □

0 1 (2) 3

Comments:

E. Targets

*1. Distance to Residential Areas

Determine the distance to the nearest residence (in miles).

Sources (circle): GIS; USGS; GEMS; Local Planning Department; Area Maps.
Comment and other source (date): _____

*2. On-Site Sensitive Environments

Yes, if there is a sensitive environment within facility boundaries or in areas with soil contamination due to facility operations; or No, if there is not a sensitive environment on-site. Sensitive environments include freshwater wetlands (greater than 2 acres), marshes, swamps, parks (national or state), and critical habitats of state and federal proposed and listed endangered species.

Sources (circle): GIS; State Department of Fisheries & Wildlife; USGS
Comment and other source (date): Site Visit

ON-SITE ROUTE
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Confirmed ■ Estimated □

E. Targets

1. Distance to nearest residential area (miles): .1

2. Is there an on-site sensitive environment (circle one)? ■ □

(Yes) No

Comments: Wetlands are located on the east side of the property adjacent to Sawmill Brook